

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA

**V.**

ANGELO MARTIGNETTI, JR.,  
Defendant

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CRIMINAL NO. 05-10131-JLT

GOVERNMENT'S MOTION UNDER §3E1.1(b) OF THE  
UNITED STATES SENTENCING GUIDELINES

The United States of America, by and through its attorney, the United States Attorney for the District of Massachusetts, hereby respectfully files this Motion pursuant to §3E1.1(b) of the U.S. Sentencing Guidelines ("U.S.S.G."). Pursuant to U.S.S.G. §3E1.1(b), the government states that the defendant Angelo Martignetti, Jr. has assisted authorities in the investigation and prosecution of his own misconduct by timely notifying authorities of his intention to enter a plea of guilty, thereby permitting the government to avoid preparing for trial and permitting the government and the court to allocate their resources efficiently. Accordingly, the government respectfully requests that if Martignetti's offense level prior to any Acceptance of Responsibility reduction is 16 or greater, that the

Court grant him a three-level reduction under U.S.S.G. §3E1.1.

Respectfully submitted,

MICHAEL J. SULLIVAN  
United States Attorney

By: /s/ Mark J. Balthazard  
MARK J. BALTHAZARD  
Assistant U.S. Attorney

**Certificate of Service**

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non registered participants on July 27, 2006.

/s/ Mark J. Balthazard  
MARK J. BALTHAZARD  
Assistant U.S. Attorney